

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRACE PARK, individually and on behalf of all
others similarly situated, et al.,

Plaintiffs,

vs.

FDM GROUP, INC.

Defendant.

Civil Action No. 16-CV-1520 (LTS)(SN)

Hon. Judge Sarah Netburn

**NOTICE OF PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that for the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion for Approval of Attorneys' Fees and Reimbursement of Expenses, the accompanying Declaration Christopher Q. Davis, and the supporting exhibits attached thereto, the undersigned respectfully move this Court, before the Honorable Sarah Netburn, United States Magistrate Judge, in the United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007, for an order:

- (1) awarding Class Counsel attorneys' fees in the sum of one million three hundred and seventy-eight thousand three hundred and thirty-three dollars and thirty-three cents (\$1,378,333.33), representing one-third of the Gross Settlement Fund;
- (2) awarding reimbursement of Class Counsel's actual out-of-pocket costs and expenses from the Gross Settlement Fund not to exceed one-hundred and twenty thousand dollars (\$120,000);
- (3) awarding payment of reasonable costs and expenses to the Claims Administrator from the Gross Settlement Fund in the amount of twenty-five thousand one hundred and eighty-eight dollars (\$25,188);

(4) granting such other, further, or different relief as the Court deems just and proper.

Plaintiffs have submitted a Proposed Order, attached as Exhibit A to the Notice of Motion for Final Approval of the Class Action Settlement and Approval of the FLSA Settlement (“Motion for Final Approval”), concurrently filed in the above-captioned action

Dated: January 4, 2020
New York, New York

Respectfully submitted,

/s/
Christopher Q. Davis
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Class Counsel